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March 31, 2020

SO ORDERED

MAR 31 2020

*The August 6, 2020 sentencing
is rescheduled for June 11,
2020 at 10:00 a.m.*

George B. Daniels
HON. GEORGE B. DANIELS

Re: United States v. Salman Poddubnov et. al.
Case No #: 18-cr-509

Dear Judge Daniels,

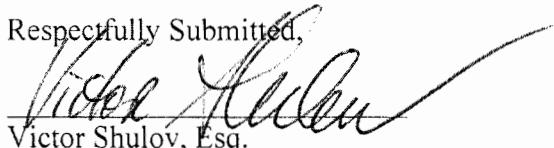
On behalf of our client Salman Poddubnov we respectfully write to Your Honor regarding the Court's Order dated March 24, 2020, adjourning the sentence of our client from April 30, 2020, to August 6, 2020. As Your Honor is aware, Mr. Poddubnov has been incarcerated since his arrest on June 5, 2019, and is currently held in Westchester County Jail. Mr. Poddubnov's sentence was initially scheduled for April 9, 2020, and later adjourned to April 30, 2020. Given the current public health emergency due to COVID 19 pandemic, we have been working diligently and have been in contact with U.S. Probation Office and the Government, trying to ensure that PSI report is ready for the sentence that was scheduled for April 30, 2020. Today I received an email from U.S. Probation Officer Ms' Jill Jefferies who stated that she has written most of the report and was hoping to

complete the report this week.

Because we will be asking the Court for a sentence of time served, such long adjournment of Mr. Poddubnov's sentence to August 6, 2020, will result in harsh consequence to our client and will add more than three months to his incarceration without even the ability to make any arguments to the Court as to his sentence. On March 24, 2020, the Court also adjourned the sentence of Mr. Poddubnov's codefendant in this case, Mr. Tengiz Khukhiashvili. Mr. Khukhiashvili is similarly situated defendant, he is incarcerated in the same jail as Mr. Poddubnov, and his sentence was initially scheduled for April 1, 2020. Nevertheless, Mr. Khukhiashvili's sentence was adjourned to June 3, 2020, more than two months earlier than Mr. Poddubnov's sentence. As of today, at least 3 correction officers in Westchester County Jail tested positive for COVID 19. Any prolonged incarceration of the Defendant that may have been otherwise released in the current condition of pandemic may result in a catastrophic consequence.

If the Court finds it impossible due to the current situation to hold the sentence on April 30, 2020, we respectfully request the Court on behalf of Mr. Poddubnov to adjourn his sentence to the earliest available date thereafter, but no later than end of May or early June 2020. Alternatively, if the Court finds it feasible to do sentencing remotely by phone or other electronic means, we respectfully ask to keep April 30, 2020, date. I discussed this request with AUSA Mr. Daniel Nessim on the phone today and he consented to it.

Respectfully Submitted,


Victor Shulov, Esq.

Sharifov & Associates, PLLC

Attorneys for the Defendant Salman Poddubnov

Cc: All Parties by ECF